




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR 22 2006

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Science Review of supplemental Product Chemistry to support registration of new food-use product, *Slug and Snail Killer* (EPA Reg. No. 42697-AR), containing **6.00 % w/w sodium ferric hydroxy EDTA (PC code: not found)** as its active ingredient.
DP Barcode: DP 327782.
Decision No. 352633.
MRID 467585-01

FROM: Clara Fuentes, Ph.D., Biologist 
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511C)

THROUGH: Russell Jones, Senior Biologist
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511C)

TO: Todd Peterson, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511C)

ACTION REQUESTED

Woodstream Corp. is requesting a new active ingredient designation for a new food use product, *Slug and Snail Killer* (EPA Reg. No. 42697-AR), containing **6.00 % w/w of new active ingredient, sodium ferric hydroxy EDTA (PC code: not found)**. The active ingredient in the new food use product was previously identified as **ferric sodium ferric EDTA (PC code: 139114)**, which is a precursor of sodium ferric hydroxy EDTA during the formulation process. The proposed product is intended to be applied directly to soil surfaces for control of slugs and snails in, and around agricultural crops, turf, ornamentals and home gardens, where slugs and snails are a problem.

RECOMMENDATIONS AND CONCLUSIONS

Woodstream Corp. (EPA Reg. No. 47629) submitted supplemental product-specific chemistry data, **MRID 467585-01**, *Beginning Materials and Manufacturing Process* (OPPTS 880.1200), for amending active ingredient designation of new food use product, *Slug and Snail Killer* (EPA Reg. No. 42697-AR), containing 6.00 % w/w of new active ingredient, sodium ferric hydroxy EDTA (PC code: not found). The registrant also submitted copies of updated CSF and product label reflecting the proposed formulation amendment.

The supplemental product chemistry data (**MRID 467585-01**) are **acceptable**.

STUDY SUMMARY

PRODUCT CHEMISTRY

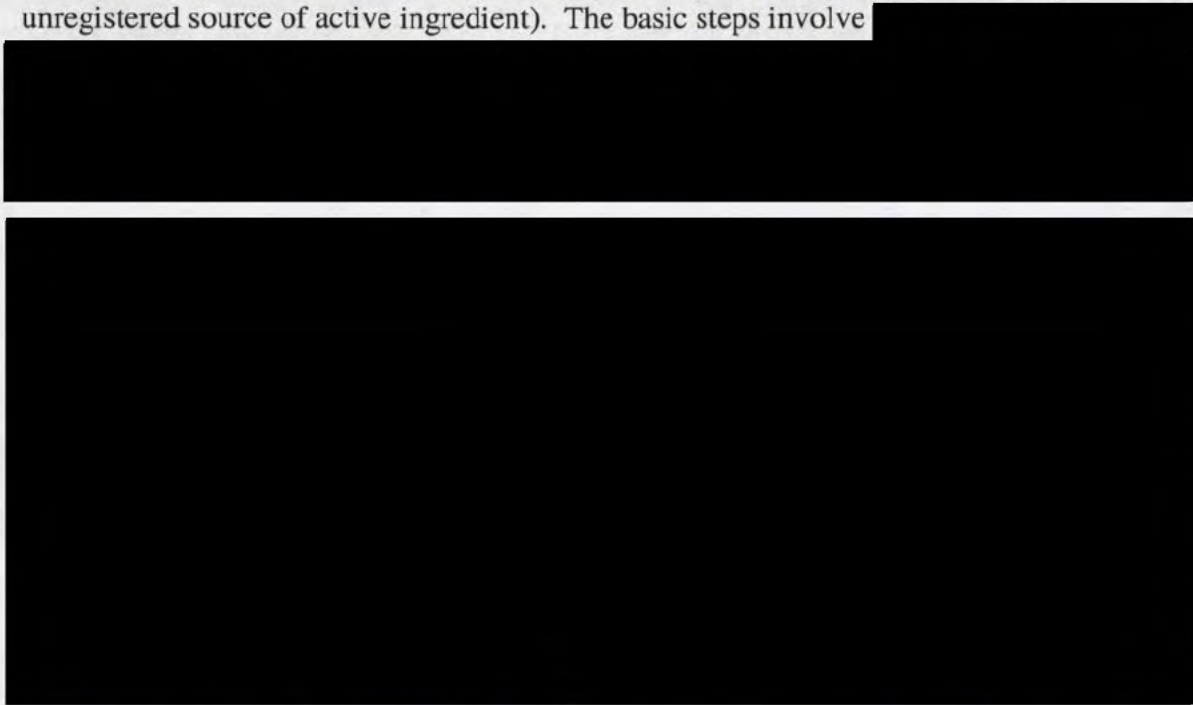
(**MRID 467585-01**)

Description of Beginning Materials and Formulation Process.

Deficiencies: None.

CONTAINS CONFIDENTIAL BUSSINESS INFORMATION

The product is manufactured through an integrated system (a batch process using unregistered source of active ingredient). The basic steps involve



^aData from CSF.

Inert ingredient information may be entitled to confidential treatment

BACKGROUND AND REVIEWER COMMENTS

Slug & Snail Killer, EPA Reg. No. 42697-AR, is an end use product to control slugs and snails in and around agricultural crops, turf, ornamentals, and home gardens. The active ingredient, 6.00% by weight ferric sodium EDTA, has been changed to 6.00% by weight sodium ferric hydroxyl. The inert ingredients (% w/w) are [REDACTED]

[REDACTED] A
petition for an exemption from the requirement of a tolerance for sodium ferric hydroxyl EDTA has been submitted. All other ingredients in the product have an exemption, although the exemptions for [REDACTED] have expired. The CSF and product label are in agreement concerning the content of active ingredient, and the certified limits for the active and inert ingredients on the CSF are within the recommended OPPTS ranges. The beginning materials and production process were adequately described.

The amended CSF, product label, and supplemental product chemistry data resubmitted in support of registration capture the fact that Ferric Sodium EDTA binds with one of the inert ingredients in the end-use formulation to form Sodium Ferric Hydroxy EDTA. Fe-Hydroxy-EDTA has similar activity to sodium ferric EDTA (PC code: 139114), and it is currently considered as another a.i. and listed as such on the CSF and product label.